



Farm Animal Welfare • The HSUS
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The National Organic Standards Board
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Washington, DC 20250
Submitted electronically to NOSB.Livestock@usda.gov

To the Members of the National Organic Standards Board:

On behalf of The Humane Society of the United States and our 10 million members and constituents, thank you for the opportunity to submit comments addressing the Interim Final Report of the Aquaculture Working Group.

The HSUS recommends the following wording changes in Section 205.259, which addresses the “harvest, transport, post harvest handling, and slaughter of aquatic animals:”

- § 205.259(c): add “(6) duration of pre-slaughter starvation”
Although starvation is used to empty the gut contents prior to slaughter, this period should be kept to a minimum.¹
- § 205.259(e): replace “a fasting period” with “pre-slaughter starvation”
- § 205.259(f): replace “killed” with “stunned” and amend end of subsection by changing to “taken from the water, with unconsciousness lasting until death.”
- § 205.259(f)(1)(i): delete subsection (i)
A blow to the head generally only results in momentary sedation.²
- § 205.259(f)(1)(ii): delete “decapitation”
For many species of fish, decapitation is unsuitable “as their body shape prevents its easy application.”³
- § 205.259(f)(1)(iv): delete subsection (iv)
Use of an ice slurry, where the fish then asphyxiate “is now considered to cause unacceptable suffering since there may be a prolonged period of stress before death.”⁴ Furthermore, in warm climates, temperature shock resulting from immersion in ice water slurry can paralyze the fish such that they appear insensible but remain conscious.⁵
- § 205.259(f)(2): delete “except as provided in (v) above”
- § 205.259(g): delete subsection (g)

Again, I thank you for this opportunity and look forward to submit further comments to the National Organic Standards Board as it continues to develop standards for organic aquaculture.

Sincerely,

Miyun Park
Vice President, Farm Animal Welfare

1. Hastein T, Scarfe AD, and Lund VL. 2005. Science-based assessment of welfare: aquatic animals. *Revue Scientifique et Technique de L'Office International des Epizooties* 24(2):529-47. www.oie.int/eng/publicat/RT/2402/PDF/hastein529-547.pdf.
2. Ibid.
3. Robb DHF and Kestin SC. 2002. Methods Used to Kill Fish: Field Observations and Literature Reviewed. *Animal Welfare* 11:269-82.
4. Lines JA, Robb DH, Kestin SC, Crook SC, and Benson T. 2003. Electric stunning: a humane slaughter method for trout. *Aquacultural Engineering* 28:141-54. www.silsoersearch.org.uk/animal-welfare/jeff/humane-slaughter.pdf.
5. Ibid.